DECL. OF MARIO N. ALIOTO ISO PLAINTIFFS' OPPOS. TO DEFENDANTS' MOT. FOR PARTIAL SUMMARY JUDGMENT ON INDIRECT PURCHASER CLAIMS

BASED ON FOREIGN SALES

MASTER FILE NO. CV-07-5944-SC, MDL NO. 1917

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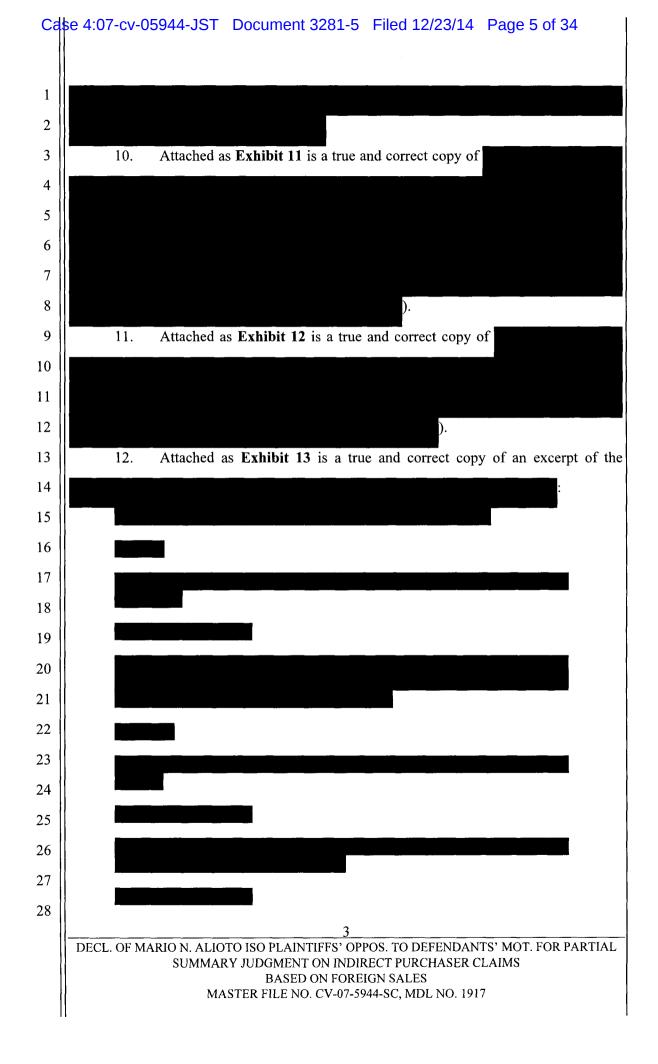
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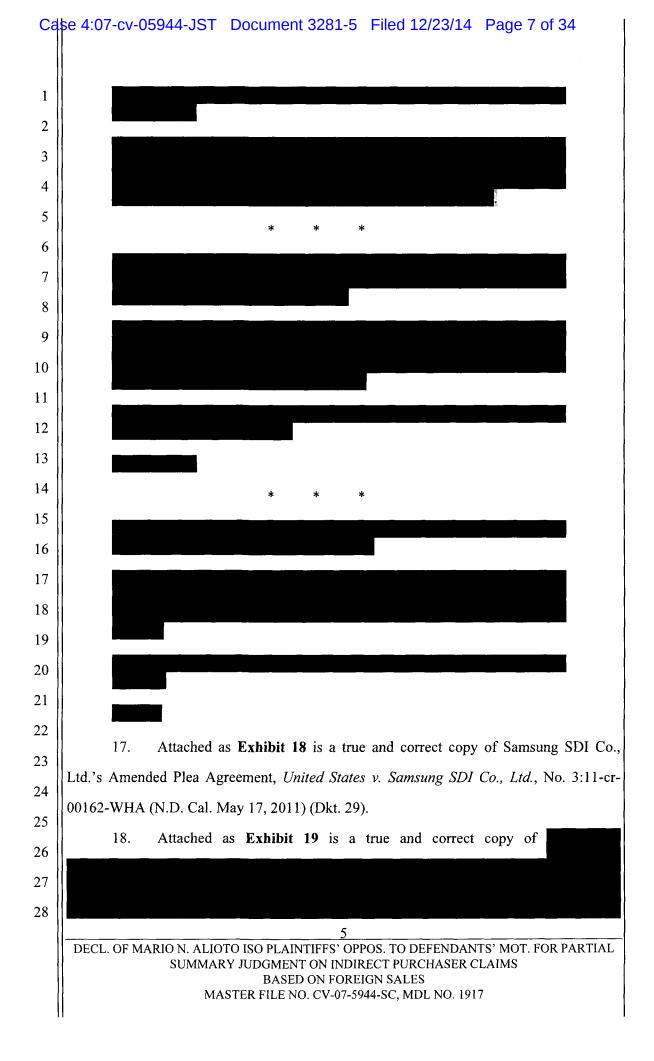
I, Mario N. Alioto, declare as follows:

I am an attorney duly licensed to practice in the State of California and before this Court. I am Lead Counsel for the Indirect Purchaser Plaintiffs. I have personal knowledge of the facts set forth herein, and could and would be competent to testify thereto if called upon to do so.

- 1. Attached as **Exhibit 1** is a true and correct copy of the United States Department of Justice Press Release entitled *Former Executive Indicted for His Role in Two Cathode Ray Tube Price-Fixing Conspiracies*, dated February 10, 2009, which states: "As Acting Assistant Attorney General in charge of the Antitrust Division Scott Hammond stated: "This conspiracy harmed countless Americans who purchased computers and televisions using cathode ray tubes sold at fixed prices."
 - 2. Attached as Exhibit 2 is a true and correct copy of
- 3. Attached as **Exhibit 3** is a true and correct copy of April 15, 2014 Expert Report of Janet S. Netz, Ph.D (hereafter "Netz Report").
- 4. The cartel allegedly consisted of 14 defendant groups: Beijing Matsushita Color CRT Company, Ltd. ("BMCC"); Chunghwa Picture Tubes Ltd. ("Chunghwa"); Orion Electric Company ("Daewoo/Orion" or "OEC"), Hitachi Ltd., its related Hitachi subsidiaries ("Hitachi"), IRICO, LG Electronics, Inc. ("LG"), Philips Display Components ("Philips"), LG.Philips Displays (a CRT joint venture between LG and Philips known as "LPD"), Toshiba Corporation and its related Toshiba subsidiaries; Matsushita Electric Corporation and its related Matsushita subsidiaries; MT Picture Display Co., Ltd. (a CRT joint venture between Toshiba and Matsushita known as "MTPD"); Samsung SDI Co. Ltd. and its related subsidiaries; Samtel Color Ltd.; and Thai CRT Company, Ltd.). Daewoo/Orion, LPD, and Thai CRT no longer exist. In addition, Thomson, Mitsubishi

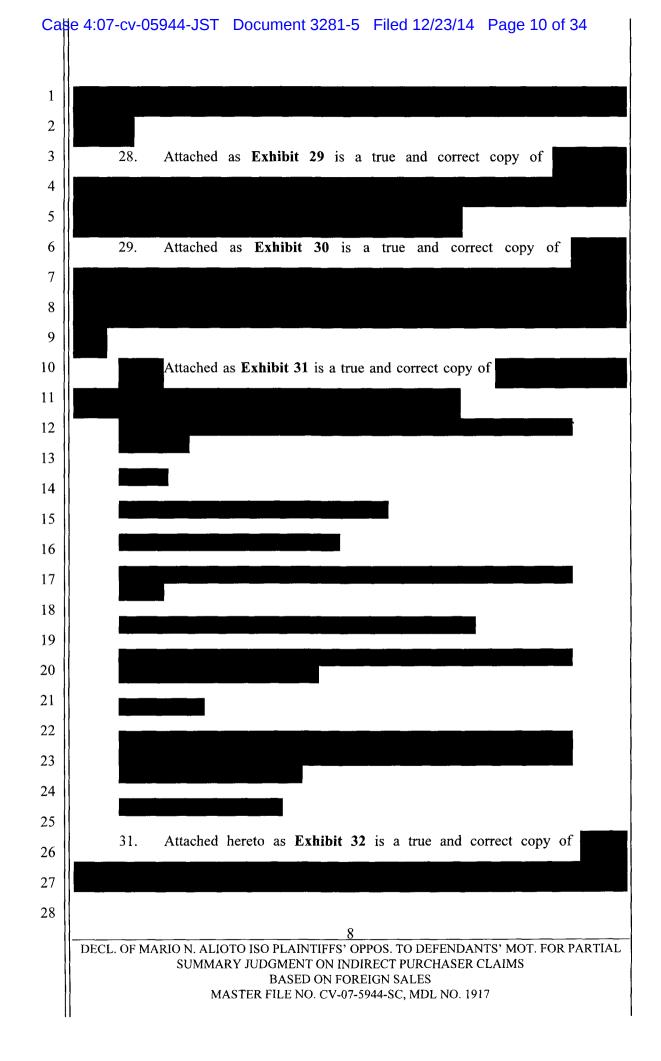
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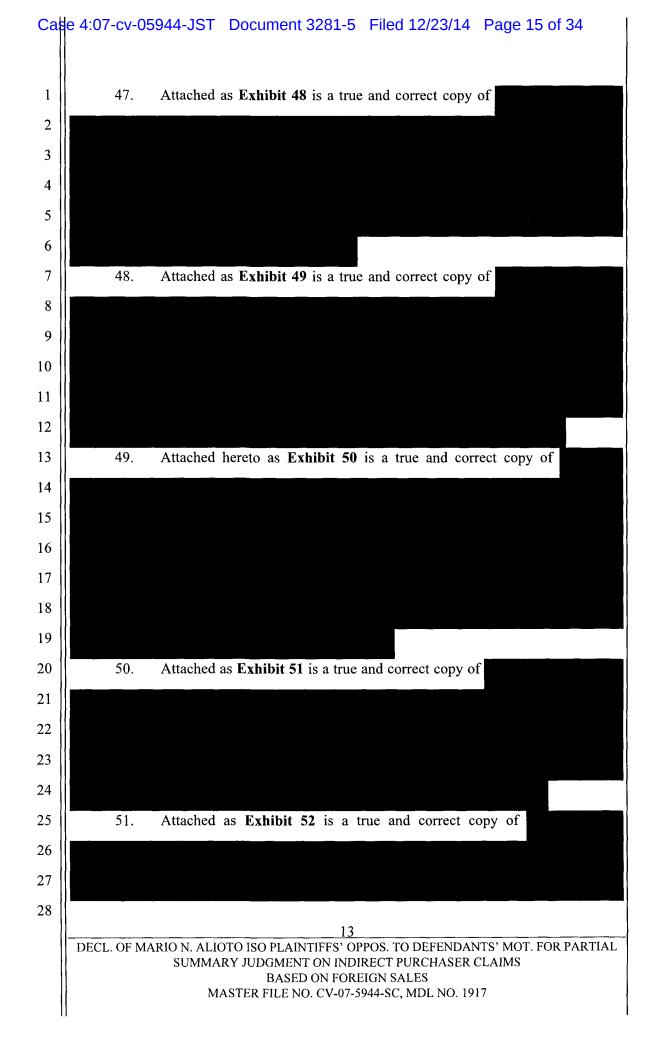
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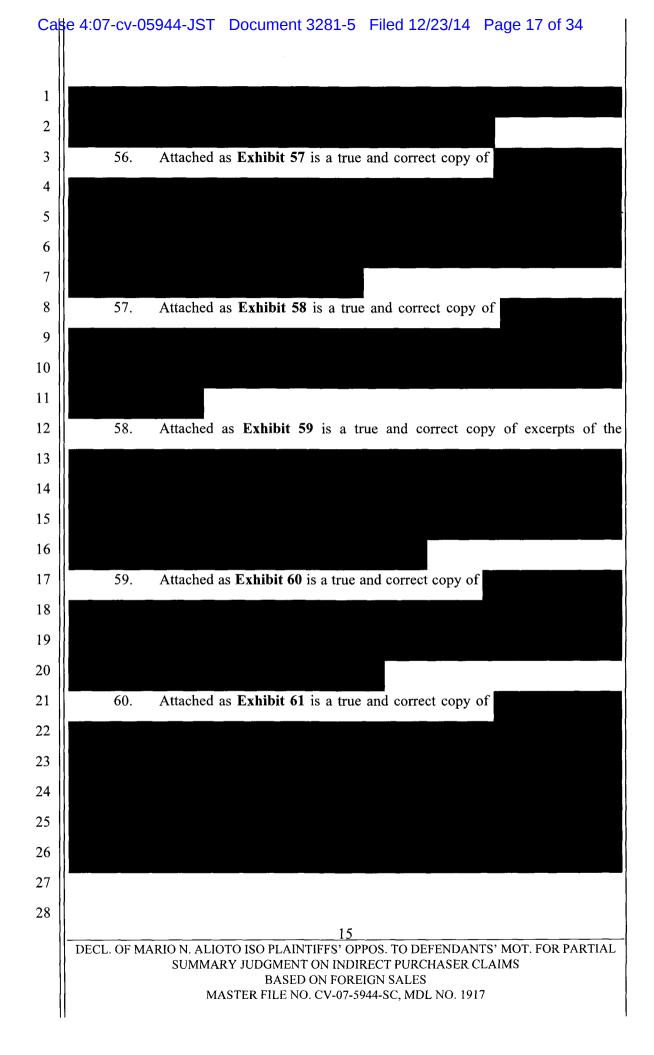


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	DECL. OF MARIO N. ALIOTO ISO PLAINTIFFS' OPPOS. TO DEFENDANTS' MOT. FOR PARTIAL SUMMARY JUDGMENT ON INDIRECT PURCHASER CLAIMS BASED ON FOREIGN SALES
	MASTER FILE NO. CV-07-5944-SC, MDL NO. 1917

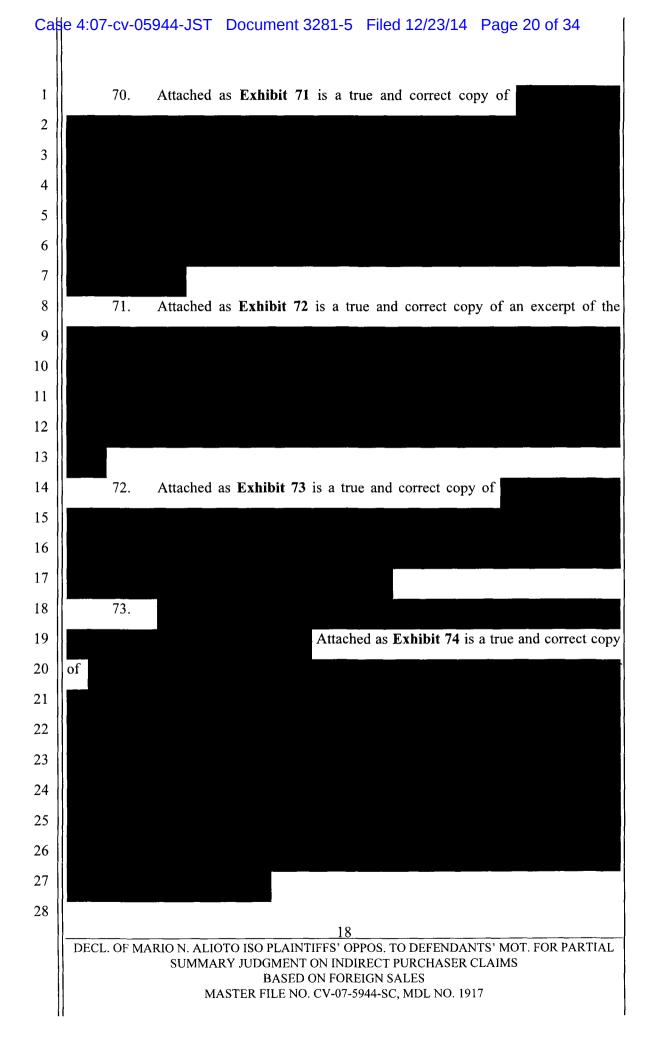
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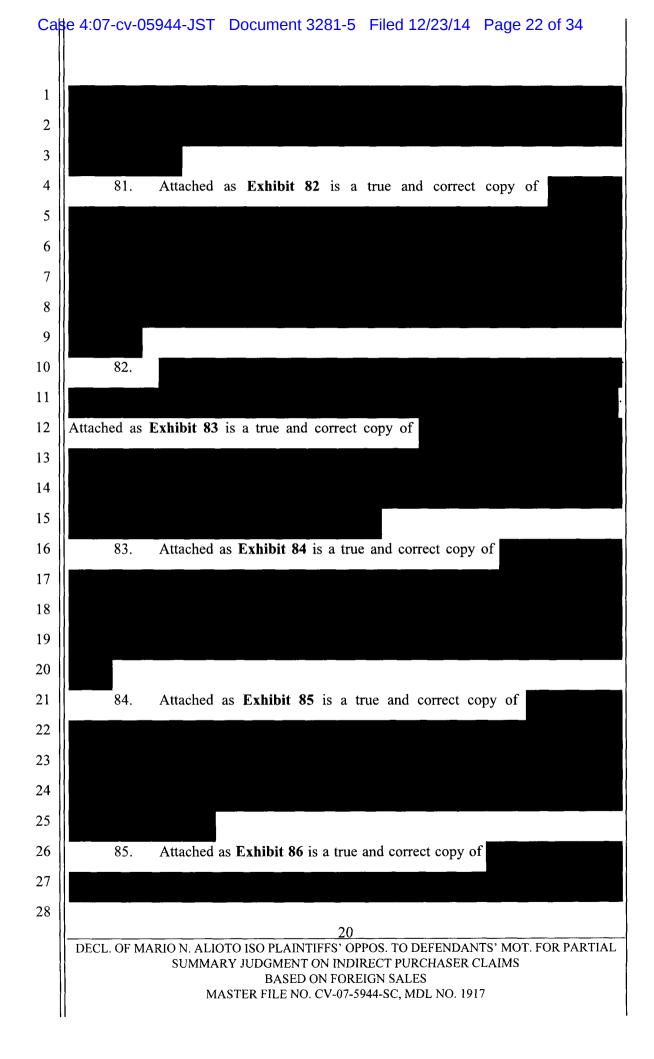
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	DECL. OF MARIO N. ALIOTO ISO PLAINTIFFS' OPPOS. TO DEFENDANTS' MOT. FOR PARTIAL
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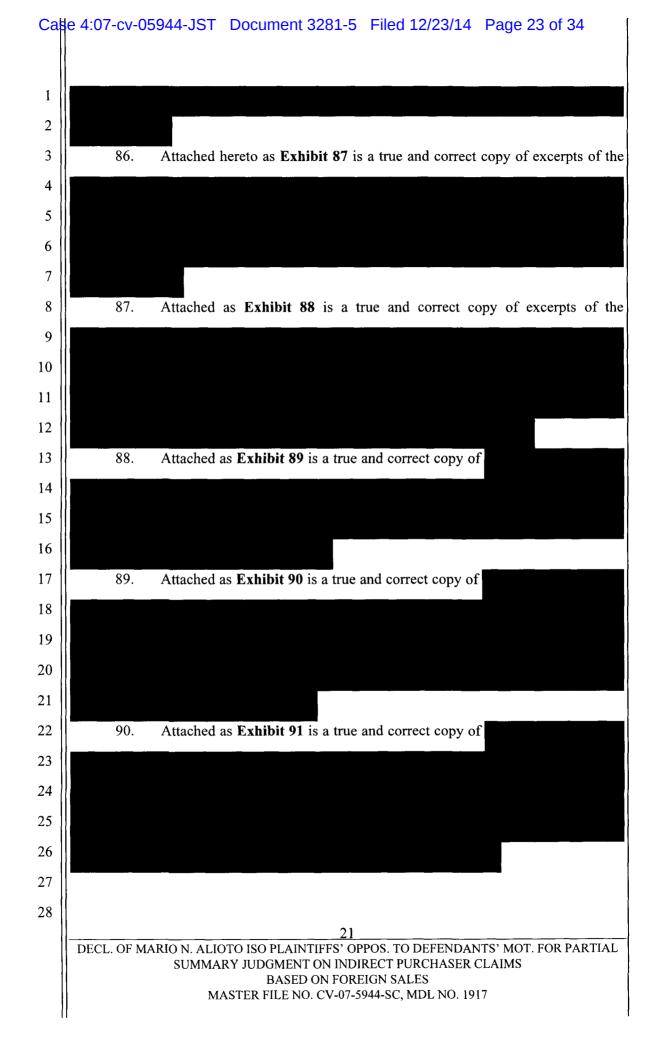


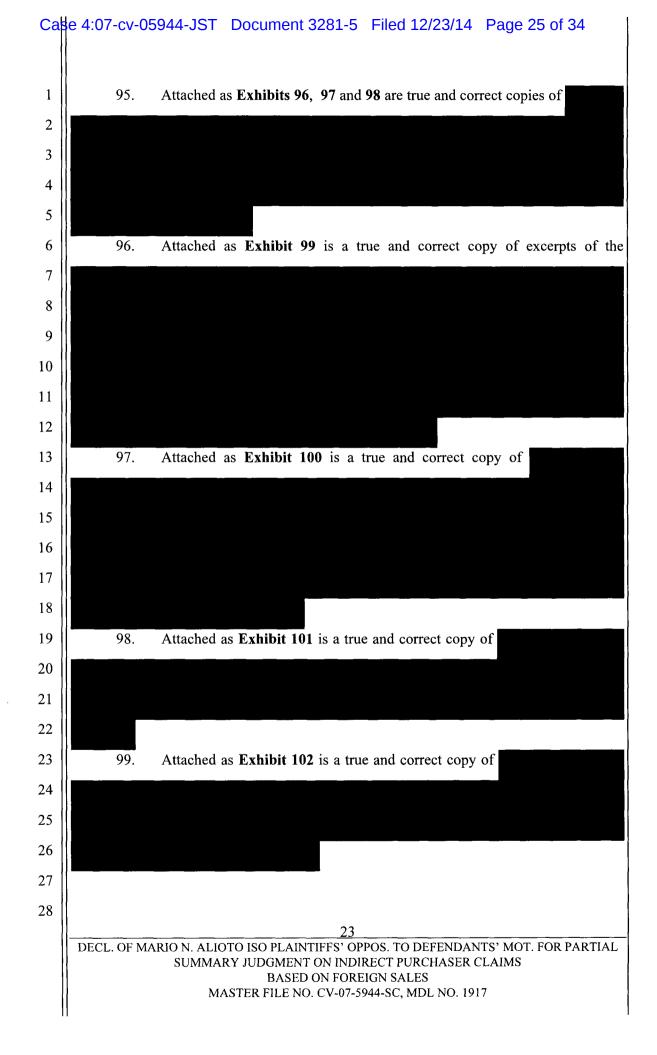
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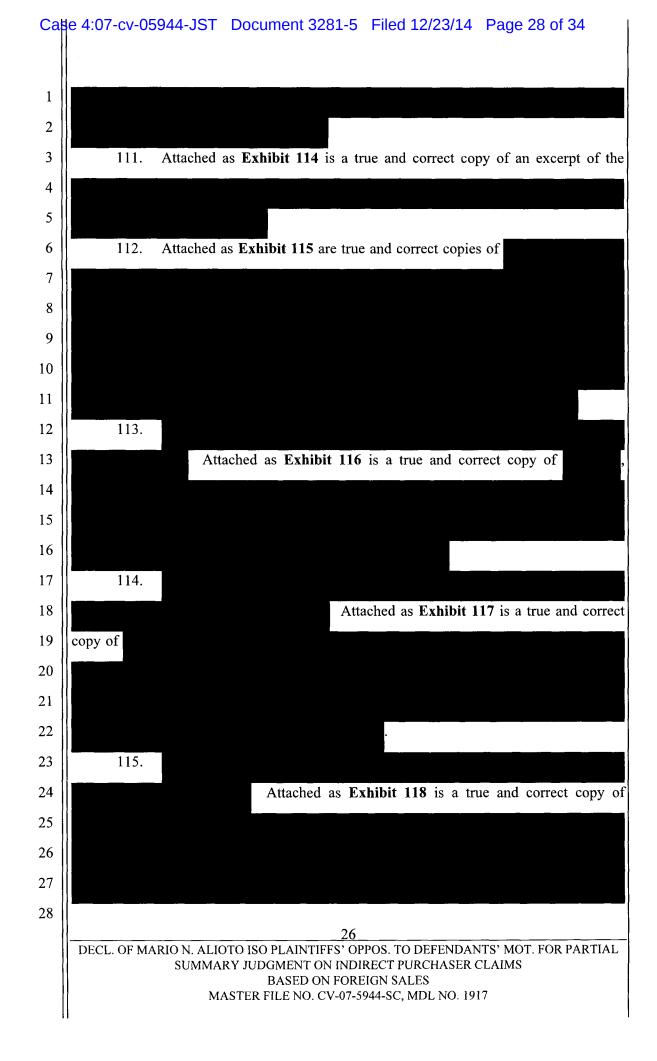


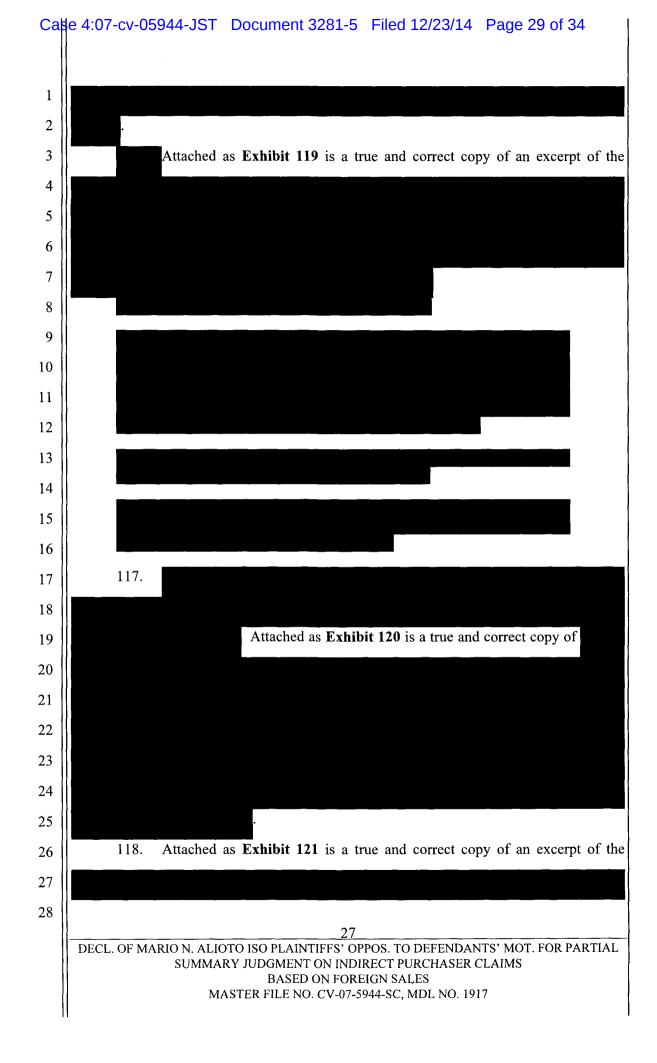
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24	143. Attached as Exhibit 146 is a true and correct copy of "Repeal the FTAIA!
25	(Or at Least Consider It as Coextensive with Hartford Fire)," CPI Antitrust Chronicle
26	(Sept.2014), which is the article cited in <i>Motorola Mobility LLC v. AU Optronics Corp.</i> ,
27 28	No. 14–8003, F.3d, 2014 WL 6678622, *10 (7th Cir. Nov. 26, 2014).
20	DECL. OF MARIO N. ALIOTO ISO PLAINTIFFS' OPPOS. TO DEFENDANTS' MOT. FOR PARTIAL SUMMARY JUDGMENT ON INDIRECT PURCHASER CLAIMS BASED ON FOREIGN SALES MASTER FILE NO. CV-07-5944-SC, MDL NO. 1917

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